IN THE COURT OF COMMON PLEAS CUYAHOGA COUNTY, OHIO

Michelle Krankowski,)
Plaintiff, v.))))
) Case No.: CV 05 573676
) Judge Shirley Strickland Saffold
) Judge Shirley Strickland Samore
Nationwide Credit, Inc)
)
Defendant.)

NOTICE OF FILING NOTICE OF REMOVAL

TO: Jeffery P. Posner, Esq. 3393 Norwood Road Shaker Heights, OH 44122-3461

PLEASE TAKE NOTICE that Defendant Nationwide Credit, Inc. is filing a Notice of Removal with the Office of the Clerk in the United States District Court for the Northern District of Ohio, Eastern Division, and, pursuant to 28 U.S.C. § 1446(d), a true and accurate copy of the Notice of Removal is attached hereto as Exhibit A for filing with the Office of the Clerk of the Common Pleas Court of Cuyahoga County, Ohio.

Dated: this 4^{μ} of November, 2005.

Respectfully submitted.

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EXHIBIT

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served by U.S. Mail, postage prepaid, this day of November 2005, upon the following counsel of record:

Jeffery P. Posner, Esq. 3393 Norwood Road Shaker Heights, OH 44122-3461

of the Attorneys for Defendant

Attorney for Plaintiff